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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JANE DOE, an Individual,  
Plaintiff,

vs.

CITY OF LAS VEGAS, CITY OF  
HENDERSON, NATHAN HANNIG, an  
Individual, MARIO RUEDA, an Individual,  
RUBEN SANCHEZ, an Individual, JAMES  
SUAREZ, an Individual, JONATHAN  
CUFF, an Individual, JOSEPH "JOE"  
VANEK, an Individual, JAROD BARTO, an  
Individual, CODY RACINE, an Individual,  
JASON TULLIS, an Individual, and ZACH  
YEOMAN, an Individual, WILLIAM  
MCDONALD, an Individual, and as an  
Individual, JON STEVENSON, an  
Individual, JOHN DOE #1, likely an  
Individual, DOES I-X; ROE  
CORPORATIONS I-X,

Defendant.

CASE NO. 2:19-cv-0382-GMN-PAL

**STIPULATION AND ORDER FOR EXTENSION OF TIME**  
**(FIRST REQUEST)**

Plaintiff's Complaint sets forth causes of action against multiple defendants, including but not limited to, the City of Las Vegas (hereinafter referred to as "City") and current and former City employees. Pursuant to Local Rules 6-1, 6-2, and 7-1, Plaintiff JANE DOE, Defendant CITY OF LAS VEGAS, hereby stipulate and respectfully request that the Court extend the time for the City of Las Vegas to Answer or otherwise respond to Plaintiff's

1 Complaint and to oppose or otherwise respond to Plaintiff's Motion for Leave to Proceed  
2 Anonymously as follows: by forty-five (45) days from **March 25, 2019** to **May 9, 2019** for  
3 Defendant to respond to Plaintiff's Motion to Leave to Proceed Anonymously ("Motion") [Dkt.  
4 No. 8]; and forty-five (45) days from **March 28, 2019** to **May 13, 2019** for Defendant to respond  
5 to Plaintiff's Complaint and Jury Demand ("Complaint") [Dkt. No. 1].

6 Upon information and belief none of the individual defendants have been served, and at  
7 this juncture the City has not determined which, if any, of the named City employees will be  
8 provided a defense or legal counsel. Accordingly, while the City does not represent any of the  
9 employees at this juncture, the intent of this stipulation would be to apply the same extension to  
10 those individuals. This first extension request is not being sought to unduly delay the  
11 proceedings; rather, for the good cause discussed above. In addition, Defendant requires  
12 additional time to conduct their internal investigation so that they may properly respond to the  
13 allegations in Plaintiff's Complaint. An additional forty-five (45) days for Defendants to file  
14 their responsive pleading and response to the Motion will not alter the date of any event or any  
15 deadline already fixed by Court order.

16 DATED this 27<sup>th</sup> day of March, 2019.

DATED this 27<sup>th</sup> day of March, 2019.

17 HKM EMPLOYMENT ATTORNEYS LLP

BRADFORD R. JERBIC  
City Attorney

18 By: /s/ Jenny Foley  
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23 IT IS SO ORDERED.

24  
25   
26 UNITED STATES MAGISTRATE JUDGE

27 April 10, 2019

28 DATE